



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMH
F. #2019R00929

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 4, 2021

By ECF and USAFx

John Carman, Esq.
666 Old Country Road
Garden City, NY 11530
Email: john@johncarmanlaw.com

Re: United States v. Baimadajie Angwang
Criminal Docket No. 20-442 (EK)

Dear Mr. Carman:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's prior productions. See ECF Nos. 30, 34, 35. The government also requests reciprocal discovery from the defendant.

The material enclosed is being produced to you subject to the discovery protective order entered by the Court on November 24, 2020. See ECF No. 28. The materials are being provided to you via the USAFx platform. Please contact me if you have any issues accessing the materials.

The documents bearing Bates numbers ANGWANG-001461 through ANGWANG-001556 are search warrants and related documentation for the defendant's residence and for a cellular telephone seized from the defendant in connection with his arrest.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of

the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: /s/ J. Matthew Haggans
J. Matthew Haggans
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (EK) (by ECF) (without enclosures)